

## Robbie Malone

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**From:** Robbie Malone  
**Sent:** Tuesday, October 30, 2012 1:46 PM  
**To:** Robbie Malone  
**Subject:** RE: Payne

Noah,

I need a response. We need the time to finish the answers with our corporate client. Both Dondi and the Texas lawyers Creed encourage lawyers to give extensions. We have not asked for other extensions. Are you opposed or not?

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**From:** Robbie Malone  
**Sent:** Tuesday, October 30, 2012 1:34 PM  
**To:** 'Noah Radbil'  
**Subject:** RE: Payne

I told you. We need the time to finish the answers with our client. Do you oppose or not?

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**From:** Noah Radbil [<mailto:noah.radbil@attorneysforconsumers.com>]  
**Sent:** Tuesday, October 30, 2012 1:31 PM  
**To:** Robbie Malone  
**Subject:** RE: Payne

You may not assume anything. Given your recent misrepresentations to the Court, and significant history of discovery misconduct, we request that you provide us either with specific reasons for your request for a discovery extension, or a copy of your emergency motion to review prior to filing.

We will of course cooperate by considering, in good faith, any specific reasons that you believe justify and extension in this matter. However, recall that your initial disclosures are severely deficient in a number of ways, including your failure to produce any documents whatsoever, including the relevant insurance policy despite our repeated requests.

Again, if there are specific reasons, please fill us in so that we may consider your request, in good faith, based upon the specific facts and circumstances underlying it.

Noah D. Radbil  
Weisberg & Meyers, LLC  
Direct: (602) 388 8903  
Toll Free: (888) 595-9111 ext. 275  
Facsimile: (866) 577-0963  
E-mail: [noah.radbil@attorneysforconsumers.com](mailto:noah.radbil@attorneysforconsumers.com)  
Website: [www.AttorneysForConsumers.com](http://www.AttorneysForConsumers.com)



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**From:** Robbie Malone [<mailto:r Malone@rmalonelaw.com>]

**Sent:** Tuesday, October 30, 2012 11:27 AM

**To:** Noah Radbil

**Subject:** RE: Payne

I will assume that is your response to the emergency motion we will be filing. Please note both DONDI which governs the Northern district and the Texas attorney creed require lawyers attorneys to cooperate on discovery extensions > Can I assume that you are opposed?

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**From:** Noah Radbil [<mailto:noah.radbil@attorneysforconsumers.com>]

**Sent:** Tuesday, October 30, 2012 1:23 PM

**To:** Robbie Malone

**Subject:** RE: Payne

If there is a specific reason that you would like me to consider, I will consider it in good faith. Otherwise, your request for an extension is denied.

Noah D. Radbil

Weisberg & Meyers, LLC

Direct: (602) 388 8903

Toll Free: (888) 595-9111 ext. 275

Facsimile: (866) 577-0963

E-mail: [noah.radbil@attorneysforconsumers.com](mailto:noah.radbil@attorneysforconsumers.com)

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**From:** Robbie Malone [<mailto:r Malone@rmalonelaw.com>]

**Sent:** Tuesday, October 30, 2012 11:23 AM

**To:** Noah Radbil

**Subject:** RE: Payne

Noah,

We need the time to finish the answers with our client.

---

**From:** Noah Radbil [<mailto:noah.radbil@attorneysforconsumers.com>]

**Sent:** Tuesday, October 30, 2012 1:20 PM

**To:** Robbie Malone

**Subject:** RE: Payne

Why do you believe that an extension is appropriate?

Noah D. Radbil  
Weisberg & Meyers, LLC  
Direct: (602) 388 8903  
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Website: [www.AttorneysForConsumers.com](http://www.AttorneysForConsumers.com)



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**From:** Robbie Malone [<mailto:rmalone@rmalonelaw.com>]

**Sent:** Tuesday, October 30, 2012 11:21 AM

**To:** Noah Radbil

**Subject:** RE: Payne

Today.

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**From:** Noah Radbil [<mailto:noah.radbil@attorneysforconsumers.com>]

**Sent:** Tuesday, October 30, 2012 1:19 PM

**To:** Robbie Malone

**Subject:** RE: Payne

When are your discovery responses due to be served?

Noah D. Radbil  
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Direct: (602) 388 8903  
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**From:** Robbie Malone [<mailto:rmalone@rmalonelaw.com>]

**Sent:** Tuesday, October 30, 2012 11:15 AM

**To:** Noah Radbil

**Subject:** Payne

Can we have a 2 week extension for answers and objections?